

REMARKS

The drawings have been amended to address an objection by the Examiner. Attached hereto are six (6) sheets of new drawings illustrating method steps as required by the Examiner. The specification has been amended to add reference numbers used to identify method steps in the drawings. No new matter has been added.

Claims 1-15 and 17-29 are pending in the application following entry of the amendments herein. Claim 16 has been canceled and claims 15 and 17 have been amended. The amendment of claim 15 is not for reasons of patentability, but to more particularly point out and distinctly claim the invention. The amendment of claim 17 is solely for the purpose of correcting dependency because of the cancellation of claim 16.

ARGUMENTS

Claims 1-15 and 17-29 are rejected under 35 U.S.C. 102(b) as anticipated by, or in the alternative, under 35 U.S.C. 103(a) as obvious based on, U.S. Pat. No. 5,191,265 (D'Aleo). Claim 1 recites a control system comprising at least one shade control network, a central processor for controlling the shade control network, and a communication interface device for each shade control network. The communication interface device is connected between the central processor and the shade control network and includes an information buffer for holding feedback information from the shade control network for independent retrieval by the central processor.

D'Aleo discloses a lighting control system in which lighting scenes are stored for recall using a scene select button. The lighting control system includes a master control module and may include slave control modules and remote control units.

D'Aleo does not disclose a control system as claimed. First, the control system of D'Aleo does not include a shade control network. As described in paragraph [0002] of the present application, a "network" of shades provides a communication arrangement in which the shades are adapted to communicate with each other. In contrast to the required network, D'Aleo merely discloses that a motorized window shade could be one of potential loads controlled from one of the controllers. (See col. 5, lines 30-40).

Second, D'Aleo does not disclose a communication interface device between a central processor and a shade control network. Furthermore, D'Aleo does not disclose a communication interface device having an information buffer for holding feedback information from a shade control network for independent retrieval by a central processor. A non-limiting example of such feedback information sent to the central processor from the shades is "the position or condition of the motorized shades." (Paragraph [0034] of the present application.)

The Examiner relies on the description in D'Aleo of a "smart" module as a purported showing of the required elements of claim 1. As noted by the Examiner, D'Aleo states that a "smart" module is a module that is "provided with intelligent electronics and a memory." (Col. 4, lines 40-41.) D'Aleo does not show or describe the required elements. The Examiner, however, takes the position that the required elements, including a shade control network, a central processor, and a communication interface device having an information buffer for holding feedback information from the shade control network, are "inherent properties of the 'smart' module" of D'Aleo. The applicants traverse as improper the attempt by the Examiner to attribute the required elements, which are not described by D'Aleo, as inherent features. A proper showing of these features is required.

For the foregoing reasons, D'Aleo does not show each and every feature of claim 1 and, therefore, does not anticipate claim 1. Furthermore, it would not have been obvious to have modified D'Aleo in the claimed manner. D'Aleo does not suggest a control system comprising a shade control network, a central processor and a communication interface device between the processor and the shade network having an information buffer for holding feedback information from the shade network. Therefore, claim 1 is not rendered obvious from D'Aleo.

Each of claims 2-5 depends from claim 1 and, therefore, is not anticipated by, or obvious from, D'Aleo for the same reasons as claim 1.

Claim 6 recites a method for controlling lights and shades comprising the steps of transmitting command signals from a central processor to a lighting control system to set dimmable loads to desired intensity levels and to a shade control system to set at least one motorized shade to a desired intensity level. The shade control system is adapted to convert the

intensity level transmitted by the central processor into a shade position for the at least one motorized shade of the shade control system.

The required method steps of claim 6 are not disclosed in D'Aleo. The Examiner takes the position that the structure of D'Aleo "inherently possesses" the method steps of claim 6. The applicants traverse as improper the attempt by the Examiner to attribute the required method steps, which are not described by D'Aleo, as inherent features. A proper showing of these method steps is required.

For the foregoing reasons, claim 6 is not anticipated by D'Aleo. Furthermore, it would not have been obvious to modify D'Aleo in the claimed manner. Therefore, claim 6 is not rendered obvious from D'Aleo. Each of claim 7-8 depends from claim 6 and, therefore, is not anticipated by, or obvious from, D'Aleo for the same reasons as claim 6.

Claim 9 recites a method for controlling lights and shades comprising the steps of programming a central processor to store preset intensity levels for a lighting control system and a shade control system and transmitting a portion of the database to the shade control system. The shade control system is adapted to convert the preset intensity levels into preset shade positions.

The required method steps of claim 9 are not disclosed in D'Aleo. The Examiner takes the position that the structure of D'Aleo "inherently possesses" the method steps of claim 9. The applicants traverse as improper the attempt by the Examiner to attribute the required method steps, which are not described by D'Aleo, as inherent features. A proper showing of the required method steps is required.

For the foregoing reasons, claim 9 is not anticipated by D'Aleo. Furthermore, it would not have been obvious to modify D'Aleo in the claimed manner. Therefore, claim 9 is not rendered obvious from D'Aleo. Each of claim 10-11 depends from claim 9 and, therefore, is not anticipated by, or obvious from, D'Aleo for the same reasons as claim 9.

Claim 12 recites a method for controlling at least one motorized shade comprising the steps of transmitting feedback information from a shade control system to a communication buffer and storing the feedback information in memory at the communication buffer.

The required method steps of claim 12 are not disclosed in D'Aleo. The Examiner takes the position that the structure of D'Aleo "inherently possesses" the method steps of claim 12. The applicants traverse as improper the attempt by the Examiner to attribute the required method steps, which are not described by D'Aleo, as inherent features. A proper showing of these method steps is required.

For the foregoing reasons, claim 12 is not anticipated by D'Aleo. Furthermore, it would not have been obvious to modify D'Aleo in the claimed manner. Therefore, claim 12 is not rendered obvious from D'Aleo. Each of claim 13-14 depends from claim 12 and, therefore, is not anticipated by, or obvious from, D'Aleo for the same reasons as claim 12.

Claim 15, as amended, recites a method for controlling a shade system comprising the steps of programming a programmable processor to store in memory a first preset value associated with a first shade position and a second preset value associated with a second shade position. The method also includes the steps of moving a motorized shade to the first preset shade position in response to an actuation of an actuator and moving the motorized shade to the second preset shade position in response to a subsequent actuation of the actuator.

The required method steps of claim 15 are not disclosed in D'Aleo. The Examiner takes the position that the structure of D'Aleo "inherently possesses" the method steps of claim 15. The applicants traverse as improper the attempt by the Examiner to attribute the required method steps, which are not described by D'Aleo, as inherent features. A proper showing of these method steps is required.

For the foregoing reasons, claim 15 is not anticipated by D'Aleo. Furthermore, it would not have been obvious to modify D'Aleo in the claimed manner. Therefore, claim 15 is not rendered obvious from D'Aleo. Each of claims 16-18 depends from claim 15 and, therefore, is not anticipated by, or obvious from, D'Aleo for the same reasons as claim 15.

Claim 19 recites a method for programming a shade control system including a communication network connected to each motorized shade of the system. The method comprises the steps of connecting a computer having user interface capability to the communication network of the shade control system and transmitting at least a portion of a database of information regarding the shade control system from the computer to the shade

control system. The method also comprises the step of storing the portion of the database of information received by the shade control system in a memory in the shade control system.

The required method steps of claim 19 are not disclosed in D'Aleo. The Examiner takes the position that the structure of D'Aleo "inherently possesses" the method steps of claim 19. The applicants traverse as improper the attempt by the Examiner to attribute the required method steps, which are not described by D'Aleo, as inherent features. A proper showing of these method steps is required.

For the foregoing reasons, claim 19 is not anticipated by D'Aleo. Furthermore, it would not have been obvious to modify D'Aleo in the claimed manner. Therefore, claim 19 is not rendered obvious from D'Aleo. Each of claims 20-29 depends from claim 19 and, therefore, is not anticipated by, or obvious from, D'Aleo for the same reasons as claim 19.

For the foregoing reasons, the applicants respectfully request that the rejection of claims 1-15 and 17-29 under 35 U.S.C. 102(b) as anticipated by, or in the alternative, under 35 U.S.C. 103(a) as obvious based on, D'Aleo be withdrawn.

It is submitted that the application is now in condition for allowance. If the Examiner believes that direct communication would advance prosecution, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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AMENDMENT TO THE DRAWINGS:

The drawings have been amended to address an objection by the Examiner. Attached hereto are six (6) sheets of new drawings. Each sheet of drawings is labeled "new sheet" as required by 37 CFR 1.121(d). No new matter has been added.